

Choi, Sangsook

From: Andrea W. Bretl <Andrea.Bretl@clarkdietz.com>
Sent: Friday, May 22, 2015 10:24 AM
To: Choi, Sangsook
Cc: Terrence K. Boyer; Bill Wagoner (arcola-administrator@consolidated.net)
Subject: RE: DRAFT

Ms. Choi,

As the City of Arcola's engineer, Clark Dietz reviewed the Libman's metal pre-treatment system effluent data made available to the City by Libman to review potential impacts of the discharge on the Arcola POTW and the POTW sludge. Our conclusion, as stated in our May 18th letter, were that the hydraulic and mass loading to the POTW from Libman are insignificant relative to the POTW flow and unlikely to cause any current or future issues for water quality or sludge quality. There have been no process upsets at the Arcola POTW, no violations of effluent POTW limitations, no known contamination of municipal sludge, and no other circumstances that indicate impact to the POTW by Libman pretreated wastewater.

Clark Dietz has not performed an engineering evaluation of Libman's existing permitted wastewater treatment system. The Libman pretreatment system that discharges under a pretreatment construction and operating permit from the IEPA (Permit No. 2010-EP-0625). As the pretreatment system is permitted by IEPA, it is assumed that IEPA performed the appropriate evaluations of the system design during the permitting process.

Clark Dietz has not evaluated Libman's sampling location or means of sample collection. As the pretreatment system is permitted by the IEPA, it is assumed that the IEPA has enforcement authority of the conditions of the permit and its compliance with State and Federal Regulations regarding sample collection.

If the USEPA or IEPA finds that the existing sampling performed by Libman is not a representative sample then it is assumed that USEPA or IEPA has the authority to require system modifications. If modifications are required then an engineering evaluation by Libman or an engineering consultant hired by Libman, would be appropriate. However, it is unreasonable to expect the City to perform an engineering evaluation on an IEPA permitted facility; especially where no adverse impacts to the POTW are suspected.

If IEPA or USEPA finds that the existing pretreatment system is not adequate then it is their responsibility to require modifications. If modifications are made and if updated sampling data is available, then it would be reasonable for the City to update the current analysis using updated data provided by Libman, collected under the authority of an IEPA pretreatment permit, to determine whether the conclusions of the May 18th letter are still valid.

Please let Terry or me know if you have any concerns,

Andrea W. Bretl, P.E.
Clark Dietz, Inc. - Engineers
217.373.8933

From: Terrence K. Boyer
Sent: Tuesday, May 19, 2015 11:36 AM
To: Andrea W. Bretl
Subject: Fwd: Revised Libman letter

Sent from my iPhone

Begin forwarded message:

From: "Choi, Sangsook" <choi.sangsook@epa.gov>
Date: May 19, 2015 at 9:00:06 AM CDT
To: Bill Wagoner <arcola-administrator@consolidated.net>
Cc: "Terrence K. Boyer" <Terrence.Boyer@clarkdietz.com>
Subject: RE: Revised Libman letter

Hello Mr. Wagoner,

We have some problems with Libman's samplings.
Their samples are nor representative of their operations.
Did your consultants knew about their funnel design of wastewater holding tank and pH adjust tank (what should be their retention time for any precipitation?), then their sampling location (photo shown) not really able to collect any representative samples at all?

Please have your consultant perform proper pretreatment engineering evaluation including those necessary retention times and getting representative samplings for compliance purpose.
Then, I would like to receive a copy of that report done accurately and properly, completely.

If you have any questions, please let me know.
Thanks for your cooperation.

Sincerely,

Sangsook Choi
Environmental enigneer
Us EPA R5
Water Enforcement and Compliance Assurance Branch (WC-15J)
77 W. Jackson Blvd.
Chicago, Il 60604

From: Bill Wagoner [mailto:arcola-administrator@consolidated.net]
Sent: Monday, May 18, 2015 12:32 PM
To: Choi, Sangsook
Cc: 'Terrence K. Boyer'
Subject: FW: Revised Libman letter

Please see the note below along with the corrected report.

From: Andrea W. Bretl [mailto:Andrea.Bretl@clarkdietz.com]
Sent: Monday, May 18, 2015 10:45 AM
To: Bill Wagoner (arcola-administrator@consolidated.net)
Cc: Terrence K. Boyer
Subject: Revised Libman letter

Bill:

Terry received and forwarded to me Libman's pre-treatment system permit (attached) this morning. Reading through the permit I find that there are two errors that we made in our May 14th letter to you:

1. In figure 1 we used Libman's process flow diagram, which called out a 12,000 g collection pit. This pit is permitted at 1,200 g. I've modified the process flow diagram to reflect the permitted volume.
2. In Tables 1 and 2 we had the maximum day and monthly average cadmium limits as 0.69 and 0.26 mg/l, respectively (per Federal Code). Per Libman's permit these limits are actually 0.11 and 0.07 mg/l. This does not impact our conclusion as their one sample result for cadmium was <0.003 mg/l.

I've revised the letter to reflect these clarifications from the permit. Please let me know if you have any questions.

Thanks,

Andrea W. Bretl, P.E.

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